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July 29, 1999

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FCC MAIL ROOM

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
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Re: CC Docket No. 99-200 - Numbering Resource Optimization

Dear Ms. Salas:

Enclosed please find the original and 12 copies of the Florida Public Service Commission Comments in the above noted docket. Please date stamp and return one copy in the enclosed self-addressed envelope.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cynthia B. Miller".

Cynthia B. Miller
Senior Attorney

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cc: Brad Ramsay
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JUL 30 1999

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)	
)	
Numbering Resource Optimization)	CC Docket No. 99-200
)	
Connecticut Department of Public)	
Utility Control Petition for Rulemaking)	RM No. 9258
Petition for Rulemaking to Amend the)	
Commission's Rule Prohibiting)	
Technology-Specific or Service-Specific)	
Service-Specific Area Code Overlays)	
)	
Massachusetts Department of Tele-)	NSD File No. L-99-17
communications and Energy Petition for)	
Waiver to Implement a Technology-)	
Specific Overlay in the 508, 617, 781,)	
and 978 Area Codes)	
)	
California Public Utilities Commission)	NSD File No. L-99-36
and the People of the State of)	
California Petition for Waiver to)	
Implement a Technology-Specific or)	
Service-Specific Area Code)	

COMMENTS OF THE FLORIDA PUBLIC SERVICE COMMISSION

Introduction and General Comments

On April 2, 1999, the Florida Public Service Commission (FPSC) filed a petition before the Federal Communications Commission (FCC) requesting that the FCC delegate to the FPSC authority to implement various number conservation measures. We asked for an expedited treatment of the petition, but it is still pending. We want to re-

emphasize the urgency of this petition. We requested that the FCC grant the FPSC the authority to: (1) institute thousand-block (and perhaps 100 block) number pooling; (2) implement sharing of NXX codes in rate centers; (3) revise rationing measures and institute NXX lotteries (prior to adoption of area code plans or establishment of an area code relief date) to prolong the life of existing area codes; (4) reclaim unused and reserved central office codes; (5) maintain the current central office code rationing measures for at least six months after the implementation of all area code relief plans; (6) expand deployment of permanent number portability; (7) implement unassigned number porting; and, (8) implement rate center consolidation.

In addition, the FPSC requested permission to use the Line Number Utilization Survey (LINUS) to run NXX reports quarterly. We also requested that the FCC direct the North American Numbering Plan Administration (NANPA) to: (1) update the Central Office Code Utilization Survey (COCUS) report quarterly, instead of annually, to provide a much more current basis for planning area code relief; and (2) establish code allocation standards to more efficiently manage numbering resources. Finally, the FPSC requested that the

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FCC expressly grant the FPSC authority to require wireless carriers to provide the COCUS report and other information necessary for the FPSC to carry out its responsibilities.

On June 2, 1999, the FCC issued a Notice of Proposed Rulemaking (NPRM) on Numbering Resource Optimization. The NPRM solicits comments on a variety of measures intended to increase the efficiency with which telecommunications carriers use telephone numbering resources. In the NPRM, the FCC clearly acknowledges the existence of serious problems with the utilization of numbering resources. The NPRM addresses the underlying causes of area code exhaustion so that consumers are spared the enormous costs and inconveniences associated with the introduction of new area codes. The FCC recognizes that implementing new area codes is not a solution that can continue indefinitely, considering the finite number of area codes.

The FPSC agrees that there are several factors that contribute to the current numbering problems: (1) the allocation of numbers in blocks of 10,000 (NXX); (2) the increased demand for numbering resources by new entrants and new technologies; (3) multiple rate centers, and the demand by most carriers to have at least one NXX

code per rate center; and (4) the absence of regulatory, industry or economic control over requests for numbering resources. Preliminary estimates indicate that a relatively low percentage of individual telephone numbers are actually assigned to customers throughout the North American Numbering Plan (NANP). NANPA estimates that the "fill rate," or actual assignment to subscribers of telephone numbers allocated to carriers, is between 5.7% and 52.6%, depending on the industry segment.

Florida, just like many other states, faces serious numbering circumstances that require immediate action. Without increased state intervention and control, area codes in Florida will continue to exhaust at an alarming rate. As illustrated in Table 1 below, every Numbering Plan Area (NPA or area code) in Florida is extremely underutilized¹. There is no greater example of this situation than in the 305 area code for Monroe County, which is currently in alleged extraordinary jeopardy. Even in jeopardy status, it is estimated that only 39% of the available telephone

¹ If any of the data is inaccurate, this illustrates the urgent need of getting accurate data.

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numbers are utilized. Florida must be able to continue to expand its number planning and conservation measures immediately.

NPA (Area code)	% of telephone numbers utilized (utilization rate)
305 (Keys)	39
305 / 786 (Dade)	35
321 (Brevard)	N/A
352	41
407 / 321 (Overlay area)	N/A
561	35
727	27
813	29
850	23
904	30
941	37
954	50

Table 1: Utilization rate of all area codes in Florida as of December 1998
based on 1998 Comparative Cost Statistics and Schedule E-19 reports
(Note: This data does not contain wireless carriers, pagers, and ALECs)

Despite the fact that area codes in Florida have a low utilization rate, there are 4 area codes presently in extraordinary jeopardy. These area codes are 904, 561, 954, and 305. On March

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22, 1999, the FPSC staff conducted its most current utilization survey, which required information on utilization levels at the 10,000, 1,000, and 100-block levels. More than 40 code holders, including some of the wireless industry, responded to this survey. The results of the survey indicate that average number utilization is sparse at all number block levels. The following table shows the aggregated summary of the 305 area code number utilization as an example of the seriousness of the problem in Florida. In this area code, only seven telecommunications companies responded to this survey.

NPA (Area code)	Average percent utilization rate at the 10,000-block level	Average percent utilization rate at the 1,000-block level	Average percent utilization rate at the 100-block level
305 (Keys) and 305 / 786 (Dade)	24	48	36

Note: This data gathered on a voluntary basis)²

The table shows that the average percent utilization rate peaks at 48% for 1,000-block numbers. This indicates that 1,000-

² If any of the data is inaccurate, this illustrates the urgent need of getting accurate data.

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block pooling would be the most efficient way to utilize telephone numbers. The FPSC strongly believes that all code applicants should be precluded from requesting additional codes from the NANPA until they have achieved a specified level of numbering utilization. While basing issuance of additional codes on the number of months to exhaust might be conceptually superior and easier to implement, such a method would rely on forecasts which could not be readily validated. We believe that either the FCC, NANPA or the state commissions should set minimum utilization rates for code holders requesting additional NXXs or NXX-Xs. Setting utilization rates for different industry groups would require an extensive review and study.

On December 17, 1998, the FPSC actively expressed its concerns with the implementation of number conservation measures by filing comments with the FCC regarding NSD File No. L-98-134-North American Numbering Council Report Concerning Telephone Number Pooling and Other Optimization Measures. We recommended that numbering resource optimization measures be implemented on a state-by-state basis, rather than nationwide. We also recommended that a portion of the unused telephone numbers within a given provider's

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NXX code be assigned to other provider(s) operating in the same area. We further stated that audits are important to ensure compliance with numbering guidelines and to prevent premature area code exhaustion. We stated that greater attention should be placed on accurate data collection in order to correctly evaluate number utilization and to better estimate the exhaustion of NPAs.

All carriers must have reasonable access to numbering resources in order to compete effectively in the telecommunications markets. Number conservation measures do not hinder reasonable access to numbering resources. On the contrary, they protect the resource for all market participants. Requiring the distribution of NXXs at a minimum level still provides equitable, efficient, and timely access to all carriers. Number conservation measures would not adversely affect call routing in the nation; would not place some carriers at risk; and would not delay area code implementation during a jeopardy period. Number conservation measures such as 1,000-block pooling would provide equal access to all numbering resources. Florida and other states need number conservation measures now. It is the FCC's duty to provide the delegation of authority in a reasonable, timely, and workable fashion; not to

create false obstacles to their implementation while the resource is wasted.

In fact, on April 12, 1999, Senator Susan Collins introduced legislation in Congress (Senate Bill 765) based on a concern about the current inefficient allocation of telephone numbers. This legislation would require the FCC to develop a plan for the efficient allocation of telephone numbers by December 31, 2000. On July 1, 1999, Representative Dennis J. Kucinich filed a companion bill. The FPSC supports the bills in their entirety.

1. Comments on Number Pooling

Number pooling is the concept of issuing telephone numbers to providers in blocks that are smaller than the traditional 10,000 numbers associated with an entire NXX. By issuing numbers in blocks of 1,000 or 100, telephone numbers can be better targeted to the actual need, resulting in better number utilization. Compared to rate center consolidation, issuing line numbers in blocks of 1,000 or 100, rather than the present 10,000, would do more to improve utilization and would not affect local and toll calling.

While the FPSC agrees with North American Numbering Council (NANC) that 1,000-block pooling could be implemented in 10 to 19

months from the issuance of a regulatory order, the FPSC also believes that technological advancements coupled with recent software developments in the telecommunications industry will permit a faster transition to implementation of 1,000-block pooling nationwide. Thus, as a first priority, we recommend that mandatory 1,000-block pooling (NXX-XX) authority be delegated to state commissions. Implementing 1,000-block pooling in major markets is an important numbering resource optimization strategy essential to extending the life of the NANP.

2. Comments on Mandatory 10-digit Dialing Measures

The FPSC agrees that mandatory 10-digit dialing would increase the number of NXX codes available in a given NPA by eliminating the need to protect codes. Traditionally, codes have been protected in order to preserve 7-digit local dialing across NPAs. The FPSC has attempted to retain 7-digit local dialing whenever possible, but we recognize that 10-digit local dialing may eventually become a necessity. Mandatory 10-digit dialing would open up the possibility of using NPA overlays in new and different ways. NPAs with spare NXX codes could share with neighboring NPAs through a globalized overlay approach. For example, the 904 area code in

North Florida could be overlaid with the neighboring 850 and 352 area codes. This would allow unassigned NXX codes in one area code to be used by neighboring area codes, thereby improving the utilization of NXX codes and extending the life of three area codes (904, 850, and 352).

Although the FPSC believes that nationwide 10-digit dialing would increase the number of telephone numbers available in an area code by about two million, the FPSC does not see any improvement in how the numbers would be utilized. Other number conservation measures, such as 1,000- or 100-block level utilization, would be more beneficial and cause less burden to customers.

3. Comments on Accurate Data Collection

On June 30, 1999, the Chief of the Common Carrier Bureau received a final report and recommendation from the North American Numbering Council (NANC) on a plan to replace the Central Office Code Utilization Survey (COCUS), the current tool for forecasting demand for central office codes. The report compares and analyzes four alternative approaches to forecast and utilization data reporting: a) AT&T's "Minimalist" Model; b) the Line Number Utilization Survey (LINUS); c) US West's "Top Down/Bottom Up"

Analysis; and d) the Hybrid approach, which contains elements of the three preceding alternatives. The report outlines the critical attributes of each approach, including the frequency of reporting, the level of detail at which data is to be reported (e.g., at the area code, central office code, or thousands-block level), and the categories of data to be reported.

As the primary reporting tool used by the NANPA, COCUS has not provided a sufficiently accurate data base upon which to make reasonable forecasts of the demand for central office codes. The report evaluates the extent to which each of the COCUS alternatives complies with a list of desired attributes, as well as the relative costs and utility gains of each of the alternatives in comparison with the current COCUS. Therefore, the FPSC supports the development of the Hybrid approach to gathering information needed to more accurately determine the life span of numbering resources. However, the FPSC conditions its support based on the following concerns that will be addressed in turn:

- a) Need for mandatory reporting by all code holders;
- b) FCC or NANPA authority to levy fines or penalties for failure to report;

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- c) Audit requirements to verify numbering data;
- d) Estimated time needed to develop new computer software;
and,
- e) State access to the quarterly COCUS data.

First, the FPSC believes that the voluntary submission of data by only some code holders has contributed to the failure of the COCUS to more accurately predict exhaust dates for many of Florida's area codes. Although the Hybrid approach calls for more frequent reporting, without the imposition of mandatory reporting by all code holders there is little hope that the hybrid model can provide improved forecasting. Any telecommunications service provider, regulated or otherwise, that utilizes an NXX code should be required to submit data to NANPA. We strongly urge the FCC to adopt rules requiring all code holders to submit numbering resource data to NANPA.

Second, concurrent with mandatory reporting by all code holders should be implementation of an enforcement mechanism designed to ensure compliance with the reporting requirements. Penalties for failure to submit the appropriate information could range from the imposition of a fine to restrictions on the issuance

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of additional NXXs. Providers must be made accountable for failure to submit timely data to NANPA or a state commission.

Third, and related to the second concern, code holders should be subject to audits which verify the accuracy and completeness of the submitted data. Although the NANC report states that audits should be conducted and controlled by industry guidelines, the FPSC does not believe that the industry should be self-policing. Audit results should be tied to the penalties as outlined above.

Fourth, the North American Numbering Council (NANC) estimates that it will take 18 to 36 months before the Hybrid model could be widely used by the industry. We are concerned that the development period is too long and may coincide with the termination date of Lockheed Martin's NANPA contract. Continued use of the current COCUS model during the Hybrid development period will result in further erosion of the remaining numbering resources. Therefore, we recommend that the FCC grant NANPA, through its contract with Lockheed Martin, the authority to require all code holders to submit COCUS data on a quarterly basis until such time as the Hybrid model becomes operational. This should reduce some of the

NPA exhaust date forecasting problems associated with the use of outdated and incomplete COCUS data.

Finally, we wish to address the need for state access to the quarterly COCUS data as well as to whatever data is submitted for the Hybrid model. State commissions must have the ability to monitor number resource utilization conditions within their respective NPAs. This access becomes even more critical in states where number pooling is planned or in use.

4. Comments on Adopting Nationwide Standards for Certain Numbering Resource Optimization Measures

The FPSC recommends that numbering resource optimization measures should start initially on a state-by-state basis, rather than nationwide. Each optimization measure has strengths and weaknesses that should be evaluated at the state level, or at a particular geographic level within a state, based on the unique characteristics of the area and the customers and providers within it.

5. Comments on Local Number Portability (LNP)

In early 1997, an operations team was formed in Florida to investigate the capabilities of switches to implement LNP. The

Florida LNP implementation team has done extensive work and testing in major Florida cities. During the testing interval, both technical and procedural LNP porting problems were encountered. These problems included, but were not limited to, switch translations, routing errors, and database omissions. E911 problems were encountered by the majority of the companies involved. These problems have been resolved. To our knowledge, all the switches within the Florida Metropolitan Statistical Areas, where permanent LNP must be implemented per the FCC, have been converted. The FPSC suggests that state commissions be given additional authority to expand the deployment of LNP to accommodate 1,000-block or 100-block pooling.

6. Additional Comments by the FPSC

In keeping with the rationale for number pooling, the FPSC recommends that a portion of the unused telephone numbers within a given provider's NXX code be assigned to other providers operating in the same area. This would require collaboration between providers and the pooling administrator. The FPSC suggests that NANPA should serve as the 1,000-block Pooling Administrator. Sequential number assignment in conjunction with 1,000-block

pooling would be the most effective way to use telephone numbers. The FPSC supports voluntary sequential number assignment in areas in which number pooling is being deployed on a trial basis.

All applicants should be required to submit evidence of their license and certificate with their applications for initial codes. We believe that this is the most efficient and least burdensome way to ensure that applicants do not obtain NXX codes in areas where they are not licensed or certificated.

The FPSC, along with other state public utility commissions in the nation, faces an enormous burden in determining when, and in what form, to implement area code relief. The FPSC has expanded its resources to convene public service hearings and workshops and to plan for different area code reliefs depending upon the geographic structure of the region being considered. The FPSC works closely with NANPA and the industry to effectively choose an area code relief plan, and it bears the costs of notifying the public. As the FCC notes, all state commissions also inevitably bear the brunt of consumer dissatisfaction with whatever method of area code relief is chosen.

The FPSC strongly recommends that additional authority should be delegated to NANPA to enforce the NXX block reclamation provisions. We are pleased to see in the Notice of Proposed Rulemaking that the FCC tentatively concluded to delegate additional authority to state public utility commissions to order NXX block reclamation in accordance with the Central Office Code (NXX) Guidelines. We believe that this grant of authority would increase the effectiveness of numbering conservation measures adopted by the states.

Conclusion

In conclusion, the FPSC makes recommendations on a number of issues including the following:

- (1) the FPSC's current petition should be acted on quickly;
- (2) 1,000-block pooling should be implemented;
- (3) states should be delegated authority to deploy local number portability (LNP);
- (4) all code applicants should be precluded from requesting additional codes from the NANPA until they have achieved a specified level of number utilization;

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(5) there should be mandatory data collection on a quarterly basis; and

(6) mandatory 10-digit dialing would not improve number utilization.

Respectfully submitted,


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Senior Attorney


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DATED: July 29, 1999

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Comments of the Florida public Service Commisison has been furnished to the parties on the attached list, this 29th day of July, 1999.



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